

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**
Pittsburgh Division

IN RE: RONALD S. JONES	Case No. 17-22147-GLT Chapter 11
Freedom Mortgage Corporation, Movant	Hearing Date: 3/2/2023 Hearing Time: 10:30 AM
vs.	
RONALD S. JONES , Debtor	

CERTIFICATE OF SERVICE OF MOTION TO CONTINUE

I certify under penalty of perjury that on this day, I served or caused to be served the Motion to Continue on the parties at the addresses shown below or on the attached list.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was:

Via CM/ECF electronic notice:

Donald R. Calaiaro, Esq.
938 Penn Avenue, Suite 501
Pittsburgh, PA 15222
Counsel for Debtor

Chapter 11 Trustee

Office of the United States Trustee
Liberty Center.
1001A Liberty Avenue, Suite 970
Pittsburgh, PA 15222
US Trustee

Via First Class Mail:

RONALD S. JONES
3307 WATERFORD DRIVE
PITTSBURGH, PA 15238
Debtor

Chapter 11 Trustee

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, names and addresses of parties served by electronic notice will be listed under the heading "Via CM/ECF electronic notice" and those served by mail will be listed under the heading "Via First Class Mail".

EXECUTED ON: March 1, 2023

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439
Matt Fissel, PA Bar No. 314567
Mario Hanyon, PA Bar No. 203993
Ryan Starks, PA Bar No. 330002
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vs.	
Freedom Mortgage Corporation, Respondent	

MOTION TO CONTINUE

AND NOW COMES, Freedom Mortgage Corporation (the “Movant”), by its attorneys, Brock and Scott PLLC, and files this Motion To Continue hearing on Debtor’s Objection to Claim scheduled for 3/2/2023, representing as follows:

1. Debtor filed an Objection to Claim of Freedom Mortgage Company on January 4, 2023.
(Document No. 269)
2. Respondent filed a Response on February 6, 2023. (Document No. 271)
3. The parties have been communicating and expect to settle the Objection. .
4. The parties request a continuance of two weeks as additional time is needed for both parties to review Freedom’s updated pre and post-petition histories.
5. Debtor’s counsel has concurred to this Motion.

WHEREFORE, Movant respectfully requests that this Honorable Court:

1. Continue the hearing scheduled for 3/2/2023 for two weeks.

Date: March 1, 2023

/s/Mario Hanyon

Andrew Spivack, PA Bar No. 84439

Matt Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

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